

IN THE UNITED STATES DISTRICT COURT OF
THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

DONALD BROUSSARD

Plaintiff

VS.

ENI US OPERATING CO., INC.

Defendant

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CIVIL ACTION NO. 3:13-cv-349

**DEFENDANT'S OBJECTIONS TO PLAINTIFF'S DESIGNATIONS
FROM THE DEPOSITION OF JOEY REGAN**

DEFENDANT'S COUNTER DESIGNATIONS

Add for optional completeness

Page 6, Lines 20-23

Page 11, Line 19 TO Page 12, Line 2

Page 17, Line 1 to Page 18, Line 4

Page 21 Lines 15-20

Page 32 Line 21 to Page 33, Line 25

Counter Designations

Page 48, Line 18 to Page 49, Line 22

Page 50, Line 16 to Page 53, Line 16

IRESON & WEIZEL, PLLC

/s/ Lansford O. Ireson, Jr.

Lansford O. Ireson, Jr., *Attorney In Charge*

Texas Bar No. 10412400

Federal I.D. No. 9114

lireson@iwlegal.com

9720 Cypresswood Drive, Suite 238

Houston, Texas 77070

Telephone No. (713) 228-1160

Facsimile No. (713) 228-1161

**ATTORNEY FOR DEFENDANT
ENI US OPERATING CO., INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been duly sent via facsimile and via CM/ECF, if the CM/ECF system allows, to counsel of record on this the January 2, 2015, as follows:

Kurt B. Arnold
Arnold & Itkin, LLP
1401 McKinney Street
Suite 2550
Houston, Texas 77010
(713) 222-3850 (Facsimile)
Counsel for Plaintiff

By: /S/ Lansford O. Ireson
Lansford O. Ireson